

Appl. No. 09/407,475
Amt. Dated 07/18/2003
Reply to Office Action of June 30, 2003

REMARKS/ARGUMENTS

In the Office Action dated June 30, 2003, claims 1, 19 and 20 were rejected under 35 U.S.C. 102(b) as being anticipated by Kirilloff (U.S. Patent No. 3,895,264). The Applicants appreciate the comments in paragraphs 3 and 4 of the Office Action that pending independent claims 18 and 22 are allowed and that, additionally, dependent claims 2-17 and 21 would be allowable if rewritten in independent form. With respect to these comments (particularly in paragraph 4), the Applicants merely wish to note that, with respect to claim 21, the steps of monitoring and indicating are not necessarily comprised within the step of grounding.

In response to the Office Action, the Applicants have amended dependent claims 2 and 21 to expressly recite the limitations of independent claims 1 and 19. These amendments are not being made for reasons substantially related to the patentability of the claims. In view of these amendments, the Applicants respectfully submit that claims 2-17 and 21 are in condition for allowance (in addition to claims 18 and 22).

With respect to claims 1, 19 and 20, the Applicants' attorney appreciates having had the opportunity to discuss claims 1 and 19 with the Examiner (as well as with Examiner Gregory J. Toatley Jr.) in the Interview conducted on August 6, 2003. In the Interview, the Applicants' attorney submitted that Kirilloff fails to show all of the recited features of claims 1 and 19 insofar as the reference fails to show the grounding of the input nodes/supply lines of a device subsequent to the disconnection of power from those nodes/supply lines, as discussed further below. The Applicants' attorney further distinguished Kirilloff as having a different purpose than the Applicants' invention as recited in claims 1 and 19, as discussed further below.

Upon considering the Applicants' arguments, the Examiner felt that the original language of claims 1 and 19 concerning the "linking" of input nodes/supply lines to ground or simply the "grounding" of those input nodes/supply lines was insufficient to distinguish the claims from Kirilloff. Consequently, it was proposed that these claims instead be amended to recite that the input nodes/supply lines are short-circuited to ground, which the Examiner agreed would overcome Kirilloff.

Therefore, as shown in the claim listing provided above, the Applicants have amended claim 1 to recite that the input nodes are "short-circuited" to ground after the voltage lines are delinked from the device. Additionally, the Applicants have also amended independent claim 19 so that it similarly recites the short-circuiting of supply lines to ground. These

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amendments do not add new matter insofar as it is evident that when contacts G-1, G-2 and G-3 shown in FIG. 2 are closed, nodes 60,62 and 64 are short-circuited to ground node 100. Further, the Applicants respectfully submit that these amendments are not being made for reasons substantially related to the patentability of claims 1 and 19 because, in the Applicants' view, the "grounding" of a node or "linking of a node to ground" would be synonymous with the "short-circuiting of the node to ground" to one of ordinary skill in the art, particularly in view of the Specification of the present Application.

In view of the above amendments, and despite the comments in paragraph 2 of the Office Action, the Applicants respectfully traverse the rejection of claims 1, 19 and 20. Each of claims 1 and 19 clearly recites that the input nodes or supply lines of the powered device are short-circuited to ground. Yet Kirilloff fails to teach the grounding of the input nodes or supply lines of a powered device. While Kirilloff does show input nodes/supply lines of a device (e.g., the conductors 7-9), these input nodes/supply lines are not directly coupled to any grounding point. Rather, these input nodes/supply lines are only indirectly coupled to the ground 22,6 by way of some or all of capacitors 13-15 and 17-19 (FIG. 1) or by way of some or all of inductors 13a-15a and 17a-19a (FIGS. 2 and 3), as well as other components such as resistors 24, 55, diode 54 and triac/silicon-controlled rectifier 25,25a.

Kirilloff fails to disclose the grounding of input nodes because Kirilloff has an entirely different purpose than the Applicants' invention. Kirilloff relates to systems that require power but, due to their operating environment and the fact that the systems are mobile (e.g., mining equipment), do not have ready access to a grounding point and consequently must be coupled to ground by way of a cable (see col. 1, lines 7-34). If the cable is damaged such that the system no longer can be coupled to ground, then a hazardous condition can result (see col. 1, lines 34-37). To avoid such a situation, Kirilloff provides a system that senses when the grounding cable no longer has a ground potential and decouples the system from the power supply if that occurs (see col. 3, line 46 through col. 4, line 17).

In contrast, the Applicants' invention concerns systems that have ready access to a grounding point. Rather than being concerned with whether the grounding point is accessible while the systems are receiving power, the Applicants' invention instead concerns verifying that the systems are indeed decoupled from the power supply and grounded at times when it is desired that the systems be shut down, to allow for repairs and the like. Therefore, while Kirilloff concerns verifying that a grounding connection is maintained while a device is

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receiving power, the Applicants' invention concerns verifying that the device is indeed isolated and grounded when it is not supposed to be receiving power.

Because Kirilloff fails to disclose all of the recited limitations of pending claims 1 and 19, and indeed bears no relation in its purpose to that of the Applicants' claimed invention, the Applicants respectfully submit that claim 1, claim 19 and claim 20 depending therefrom are allowable over Kirilloff for at least these reasons.

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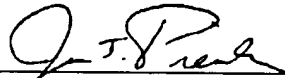
Conclusion

Given the Applicants' Remarks and Amendments, the Applicants respectfully request reconsideration and allowance of the present Application.

The Applicants wish to invite the Examiner to telephone the Applicants' attorney at the number listed below if discussion with the Applicants' attorney would be of assistance to the Examiner or further the prosecution of the present Application.

Respectfully submitted,
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By: _____



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